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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

VISHAL CHAMARIA, an individual;
VIVEK CHAMARIA, an individual; PUJA
CHAMARIA, an individual; GAURI
CHAMARIA, an individual; P & V, LLC, a
California limited liability company; CHIP
SHOP, LLC, a California limited liability
company,

Plaintiffs,

vs.

TONY M. DIAB, an individual; SHOOK,
HARDY & BACON, L.L.P., a Missouri
limited liability partnership; MATTHEW
GREGORY JONES, an individual; G & M
MANAGEMENT SERVICES, INC., a
California corporation, dba JONES REAL
ESTATE; DOES I through X, individuals;
and ROE BUSINESS ENTITIES I through X,
inclusive,

Defendants.

Case No.: 2:17-CV-02023-JAD-CWH

**STIPULATION AND ORDER TO EXTEND TIME TO RESPOND TO MOTION TO
DISMISS FOR LACK OF PERSONAL JURISDICTION (DKT. 20)**
(Second Request)

Plaintiffs VISHAL CHAMARIA, VIVEK CHAMARIA, PUJA CHARMARIA, GAURI
CHAMARIA, P & V, LLC, and CHIP SHOP, LLC (collectively, the "Plaintiffs"), by and through
their attorney of record ALEXIS L. BROWN, ESQ. of the law office of ALEXIS BROWN LAW,
CHTD., and Defendants MATTHEW GREGORY JONES and G & M MANAGEMENT
SERVICES, INC., by and through their attorney of record BRADLEY J. HOF LAND, ESQ. of
the law office HOF LAND & TOMSHECK, hereby enter into this Stipulation to Extend Time to

1 Respond to Motion to Dismiss for Lack of Personal Jurisdiction (Dkt. 20) (Second Request)
2 pursuant to Fed. R. Civ. P. 6 and L.R. IA 6-1 as follows:

3 WHEREAS on July 31, 2017, Mr. Diab filed Defendant Tony M. Diab's Notice of Motion
4 and Motion to Dismiss for Lack of Personal Jurisdiction; Memorandum of Points and Authorities
5 Thereon (the "Diab Motion to Dismiss") (Dkt. 10).

6 WHEREAS on August 8, 2017, Defendants Matthew Gregory Jones and G & M
7 Management Services, Inc. (the "Jones Defendants") filed a Notice of Motion and Motion to
8 Dismiss Complaint Against Defendants Matthew Gregory Jones and G & M Management
9 Services, Inc. for Lack of Personal Jurisdiction (the "Jones Defendants' Motion to Dismiss") (Dkt.
10 20).

11 WHEREAS pursuant to Court order, Plaintiffs' response to the Jones Defendants' Motion
12 to Dismiss (Dkt. 20) is currently due August 30, 2017. Dkt. 31.

13 WHEREAS the Parties previously agreed that Plaintiffs' response to the Jones
14 Defendants' Motion to Dismiss could be submitted along with their response to the Diab Motion
15 to Dismiss due to Plaintiffs' allegations of the interconnectedness of the jurisdiction against Mr.
16 Diab and the Jones Defendants. Dkt. 31.

17 WHEREAS the Parties also previously agreed to extend the time for Plaintiffs to respond
18 to the Diab Motion to Dismiss and Jones Defendants' Motion to Dismiss to allow for meaningful
19 discussion of settlement of all claims. Dkt. 28, 31, 32.

20 WHEREAS, after Plaintiffs filed their Motion for an enlargement of time to respond to
21 the Jones Defendants' Motion to Dismiss, Dkt. 35, the Parties informally agreed to extend the
22 Plaintiffs' response deadline to September 2, 2017 and then to September 8, 2017 to allow for
23 such ongoing settlement discussions.

24 WHEREAS settlement discussions have unfortunately stalled since September 6, 2017,
25 requiring the parties to proceed with this case.

26 WHEREAS in light of the foregoing, the Parties stipulate and agree that Plaintiffs shall
27 have this second extension until September 8, 2017 to respond to the Jones Defendants' Motion
28 to Dismiss.

1 WHEREAS the Parties agree to allow the Jones Defendants a one business day extension
2 of time through September 18, 2017 to file their reply in support of the Jones Defendants' Motion
3 to Dismiss.

4 Based on the foregoing,

5 IT IS HEREBY STIPULATED that good cause exists to allow Plaintiffs until September
6 8, 2017 to respond to the Jones Defendants' Motion to Dismiss (Dkt. 20).

7 IT IS FURTHER STIPULATED that good cause exists to allow the Jones Defendants
8 until September 18, 2017 to file a reply in support of the Jones Defendants' Motion to Dismiss
9 (Dkt. 20).

10 DATED this 7th day of September, 2017.

11 ALEXIS BROWN LAW, CHTD.

12 */s/ Alexis L. Brown*

13 By: _____
Alexis L. Brown (No. 12338)

14 Attorney for Plaintiffs

15 DATED this 8th day of September, 2017.

16 HOFLAND & TOMSHECK

17 */s/ Bradley J. Hofland*

18 By: _____
Bradley J. Hofland (No. 6343)

19
20 IT IS SO ORDERED.

21
22 
23 _____
U.S. DISTRICT COURT JUDGE

24 DATED: 9/11/2017
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